

# ASSESSMENT CHECKLIST

## CODE OF ENVIRONMENTAL MANAGEMENT PRINCIPLES (CEMP)

**COMPANY:** Department of Commerce

**LOCATION:** Herbert C. Hoover Building (HCHB)  
Washington, D.C

**DATE:** 23 - 27 February 2004

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**CONDUCTED BY:** ABS Consulting  
Training and Consulting Division

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### Personnel Interviewed

Department	Name	Title / Function

[illegible]

[illegible]

The agency makes a written top-management commitment to improved environmental performance by establishing policies which EMS hasize pollution prevention and the need to ensure compliance with environmental requirements.

**Environmental Management Manual (EMM) Manual Section:  
Environmental Management System (EMS) Procedures:**

1.1 Obtain Management Support

	Y	N
Does the agency ensure support for the environmental program by management at all levels and assign responsibility for carrying out the activities of the program?		

A. Questions for Top / Upper Level Management personnel:

- 1) How do you see an EMS as a positive benefit?
- 2) How do you demonstrate support for the EMS?
- 3) How do you ensure support for the EMS by management at all levels of the organization?
- 4) How are responsibilities assigned for carrying out the activities of the EMS?
- 5) How do you ensure that activities necessary to support the EMS are adequately funded and staffed?

B. Questions for Mid-Level Managers and Supervisors

- 1) What is your awareness of the DOC EMS?
- 2) Have you been assigned responsibilities for managing or performing activities associated with the EMS? If yes, what are they?
- 4) How do you demonstrate support for the EMS?
- 5) Do you feel that you receive adequate support (i.e., priorities, personnel and financial) in order to meet your EMS responsibilities? If not, why not?

C. Questions for Department Employees

- 1) What is your awareness of the DOC EMS?
- 2) Have you been assigned responsibilities for performing activities associated with the EMS? If yes, what are they?
- 3) Do you feel that you receive adequate support in order to perform your meet your environmental responsibilities? If not, why not?

1.1.1 Policy Development

	Y	N
Has the agency established an environmental policy followed by an environmental program that complements its overall mission strategy?		

A. Questions for Top / Upper Level Management personnel:

- 1) Have you established an environmental policy?
- 2) How do you communicate the environmental policy throughout the DOC organization?
- 3) What are the basic elements of the EMS that implement and support the environmental policy?
- 4) In what ways do you see an EMS complementing DOC's overall mission strategy?
- 5) Can you provide measurement data that shows how well environmental goals are being / have been met?

B. Questions for Mid-Level Managers and Supervisors

- 1) Are you aware of the environmental policy? Can you explain in your own words what that policy means to you in relation to your job?
- 2) Have you been involved in either the development and/or the monitoring and measuring of

environmental goals or objectives related to the environmental policy? If yes, what are they?

### C. Questions for Department Employees

Repeat Question 1.1.1B.1.

## **I. Principle #1: Management Commitment (cont)**

### 1.1.2 System Integration

	<b>Y</b>	<b>N</b>
Does the agency integrate the EMS throughout its operations, including its funding and staffing requirements, and reach out to other organizations?		

#### A. Questions for Top / Upper Level Management personnel:

- 1) How have you integrated the EMS throughout DOC's operations?
- 2) How does this integration include funding and staffing requirements for the EMS?
- 3) Have you reached out to other organizations? If yes, to whom and how?

#### B. Questions for Mid-Level Managers and Supervisors:

- 1) Are you involved in any planning, implementing and/or measuring activities related to the EMS? If yes, what and how?
- 2) Have you been involved in improving communication and/or teamwork related to the EMS? If yes, in what regard? What, if any, improvements have you seen?
- 3) Have you been the recipient of increased funding and/or staffing in order to accomplish any environmental-related goals or objectives? If yes, what and how much?
- 4) Have you received any awareness training regarding the EMS? If yes, what and when? Were records of the training maintained?
- 5) Have you provided any awareness training regarding the EMS? If yes, what, when and to whom? Were records of the training maintained?

#### C. Questions for Department Employees:

- 1) Repeat Question 1.1.2B.4.
- 2) Have you been assigned any specific responsibilities with regard to the EMS? If yes, what?

### 1.2 Environmental Stewardship and Sustainable Development

	<b>Y</b>	<b>N</b>
Does the agency strive to facilitate a culture of environmental stewardship and sustainable development?		

#### A. Questions for Top / Upper Level Management personnel:

- 1) How have you facilitated a culture of environmental stewardship with the DOC? (In other words, how do you encourage DOC employees to recognize the impacts of its activities, regardless of what they are, on environmental conditions, and to adopt practices to reduce or eliminate negative environmental impacts?)
- 2) Have you assigned somebody within DOC to formally examine all aspects of DOC's activities to identify those that could have an adverse impact on the environment? If yes, who, and what has been the outcome of that analysis?
- 3) How have you facilitated a culture of sustainable development within the DOC? (In other

words, how do you educate DOC employees on recognizing the need to meet “the needs of the present without compromising the ability of future generations to meet their own needs”?)

4) How do you ensure that DOC employees have an understanding of the environmental aspects of DOC’s activities, and the consequences of inaction or negative action?

5) How have you encouraged the organization to go beyond just complying with applicable laws and regulations and to improving overall environmental performance

B. Questions for Mid-Level Managers and Supervisors:

1) Have you been involved in a team or group that has prepared, or is preparing, an environmental action plan to improve environmental performance?

2) Have you assessed or evaluated the environmental implications of your activities or proposed activities? If yes, have the results of your evaluations been incorporated into the decision-making processes for the organization?

C. Questions for Department Employees:

1) Have you been made aware of any environmental aspects of your activities? If yes, have you been made aware of any consequences of inaction or negative action?

## **II Principle #2: Compliance Assurance and Pollution Prevention**

**The agency implements proactive programs that aggressively identify and address potential compliance problem areas and utilize pollution prevention approaches to correct deficiencies and improve environmental performance.**

### **Documentation**

**EMM Section:**

**EMS Procedures:**

#### 2.1 Compliance Assurance

	<b>Y</b>	<b>N</b>
Has the agency instituted support programs to ensure compliance with environmental regulations and encourages setting goals beyond compliance?		

A. Questions for Top / Upper Level Management personnel:

1) Have you designated someone or a team to identify all environmental regulations that are applicable to DOC’s operations? If yes, who?

2) What elements of your EMS ensure compliance with applicable environmental regulations?

3) In what ways do you encourage the organization to go beyond compliance? (In other words, are there any elements of the EMS that are pro-active in nature to prevent pollution, rather than just ensuring simple compliance with regulations?)

4) Do you either require or encourage outside organizations with which the DOC interacts, such as contractors, to be environmentally responsible?

B. Questions for Mid-Level Managers and Supervisors:

1) Do you participate in a regulatory compliance group? If yes, what are your specific

responsibilities and authorities?

2) How are environmental compliance issues brought to the attention of top / upper management?

3) Do you maintain any environmental records? Are they available for review?

C. Questions for Department Employees:

1) What information or training have you received regarding compliance with environmental regulations? with pollution prevention?

## 2.2 Emergency Preparedness

	Y	N
Has the agency developed and implemented a program to address contingency planning and emergency response situations?		

A. Questions for Top / Upper Level Management personnel:

1) Is there an emergency response program for the HCH Building? If so, what does it consist of?

2) Have you assigned responsibilities to identify any hazards associated with DOC activities? If yes, who or what group?

B. Questions for Mid-Level Managers and Supervisors:

1) Are you a member of an emergency response team? If yes, what are your responsibilities?

2) Have you scheduled / coordinated any type of emergency response drill for the HCH Building? If yes, when? Are records of these drills maintained and available for review?

C. Questions for Department Employees:

1) Have you participated in any type of emergency response drill while working in the HCH Building?

2) Have you received any type of training in emergency response?

## **II Principle #2: Compliance Assurance and Pollution Prevention (cont)**

### 2.3 Pollution Prevention and Resource Conservation

	Y	N
Has the agency developed a program to address pollution prevention and resource conservation issues?		
Element Score*		

A. Questions for Top / Upper Level Management personnel:

1) Have you implemented a pollution prevention program for DOC? If yes, what does it include and how do you integrate the program into DOC's activities?

2) Does the pollution prevention program include resource conservation measures? If yes, what do they encompass?

3) How do you encourage DOC employees to identify opportunities for pollution prevention?

4) Have you established any goals related to pollution prevention? If yes, what are they and how are they measured?

B. Questions for Mid-Level Managers and Supervisors:



- 1) Do you oversee any pollution prevention and/or resource conservation programs? If yes, what?
- 2) Have you identified, or has an employee brought to your attention, an opportunity for pollution prevention and/or resource conservation? If yes, how was this information used?
- 3) Do you either purchase, or submit requisitions for, materials used by DOC employees? If yes, is there a program to use environmentally-friendly materials (e.g., recycled-content materials, toxic-free cleaners, etc.)?

C. Questions for Department Employees:

- 1) Have you identified any opportunities for pollution prevention and/or resource conservation? If yes, did you submit your idea? What happened?
  - 2) Have you received any training on pollution prevention and/or resource conservation? If yes, when and what? Were records of your training maintained? If yes, who maintains the records?
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### III Principle #3: Enabling Systems

**The agency develops and implements the necessary measures to enable personnel to perform their functions consistent with regulatory requirements, agency environmental policies , and its overall mission.**

#### Documentation

**EMM Section:**  
**EMS Procedures:**

#### 3.1 Training

	Y	N
Does the agency ensure that personnel are fully trained to carry out the environmental responsibilities of their positions?		

A. Questions for Top / Upper Level Management personnel:

- 1) Do you have an environmental training program in place? If yes, what does it include and who manages the program?
- 2) How do you ensure that adequate resources are provided so that personnel with environmental responsibilities are fully trained to do their jobs?

B. Questions for Mid-Level Managers and Supervisors:

- 1) Do you have specific environmental responsibilities? If yes, what training have you received?
- 2) Do any employees who work for you have environmental responsibilities? If yes, how do you ensure that they are adequately trained to carry out those responsibilities?
- 3) Do you maintain records of environmental-related training? If yes, are they available for review?

### III Principle #3: Enabling Systems (cont)

#### 3.1 Training (cont)

##### C. Questions for Department Employees:

- 1) Have you received any general awareness training on the DOC's EMS?
- 2) Do you have specific environmental responsibilities? If yes, what are they and how were these responsibilities explained to you?
- 3) Do you fully understand your environmental responsibilities?
- 4) When was the last time you received training in your environmental responsibilities?
- 5) Do you feel that you have received sufficient training to carry out the environmental responsibilities of your position?

#### 3.2 Structural Support

	Y	N
Has the agency developed and implemented procedures, systems, programs, and objectives that enhance environmental performance and support positive achievement of organizational environmental and mission goals?		

##### A. Questions for Top / Upper Level Management personnel:

- 1) How have you supported your EMS with procedures, systems, programs and objectives?
- 2) How do you ensure that procedures, systems, programs and objectives enhance environmental performance? Support positive achievement of environmental and mission goals?
- 3) Have any of the procedures, systems, programs and objectives been documented? If yes, how are they made available?

##### B. Questions for Mid-Level Managers and Supervisors:

- 1) Do you maintain environmental-related procedures, systems, programs and/or objectives? If yes, how?
- 2) Are any procedures, systems, programs and/or objectives that you maintain documented? If yes, how do you maintain the documentation (i.e., periodic review, update, approve/reapprove)?
- 3) Do you monitor and/or measure data related to environmental programs and objectives? If yes, what is the data telling you about the effectiveness of the EMS?
- 4) How do you encourage input from all employees?

##### C. Questions for Department Employees:

- 1) What do you do if you identify an error in an environmental document?
- 2) What do / can you do if you identify an opportunity to improve an environmental-related document, system or program?

#### 3.3 Information Management, Communication and Documentation

	Y	N
Has the agency developed and implemented systems that encourage efficient management of environmentally-related information, communication and documentation?		

**A. Questions for Top / Upper Level Management personnel:**

- 1) How do you encourage the efficient management of environmentally-related information, communication and documentation?
- 2) How do you ensure that a clear organizational structure, with clear lines of communication, has been established?
- 3) What are the primary methods of communicating environmental-related information? How do you determine whether these methods are effective?
- 4) Have you assigned managerial responsibility for information management? If yes, how?

**B. Questions for Mid-Level Managers and Supervisors:**

- 1) Do you have any environmental responsibilities? If yes, how do you manage information, communication and/or documentation related to your environmental responsibilities?
- 2) What key environmental records and documents must be maintained.
- 3) How do you ensure that relevant environmental information is effectively communicated throughout the organization?

**III Principle #3: Enabling Systems (cont)****3.3 Information Management, Communication and Documentation (cont)****C. Questions for Department Employees:**

- 1) What information have you received regarding environmental issues?
  - 2) What options do you have available to you if you have an environmental concern?
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**IV Principle #4: Performance and Accountability**

**The agency develops measure to address EMS employee environmental performance, and ensure full accountability of environmental functions.**

**Documentation****EMM Section:****EMS Procedures:****4.1 Responsibility, Authority and Accountability**

	<b>Y</b>	<b>N</b>
Does the agency ensure that personnel are assigned the necessary authority, accountability, and responsibilities to address environmental performance, and that employee input is solicited?		

**A. Questions for Top / Upper Level Management personnel:**

- 1) How have you ensured that appropriate personnel are assigned the necessary authority and responsibilities to address environmental performance?
- 2) How do you ensure employee accountability is maintained for environmental performance?

3) In what ways is employee input solicited? What is done with employee input?

**B. Questions for Mid-Level Managers and Supervisors:**

- 1) Are you responsible for completing any environmentally-related tasks? If yes, what authorities do you have related to that responsibility?
- 2) Are your environmental responsibilities and authorities clearly defined? How?
- 3) How is employee input solicited?

**C. Questions for Department Employees:**

- 1) Do you feel comfortable offering suggestions for improvement in the environmental program to your supervisor/manager?

#### 4.2 Performance Standards

	Y	N
Does the agency ensure that employee performance standards, efficiency ratings, or other accountability measures, are clearly defined to include environmental issues as appropriate, and that exceptional performance is recognized and rewarded?		

**A. Questions for Top / Upper Level Management personnel:**

- 1) How do you ensure that employee performance standards, efficiency ratings and other accountability measures are clearly defined to include environmental issues, as appropriate? (For example, is performance criteria relating to environmental practices specifically incorporated into employee evaluation criteria?)
- 2) Do you have a program for recognizing and/or rewarding exceptional environmental performance? If yes, how does it work? Has any employee been recently recognized or rewarded?

**B. Questions for Mid-Level Managers and Supervisors:**

- 1) Do performance standards for your position include appropriate environmental issues?
- 2) Is there a program for recognizing exceptional performance related to environmental performance? If yes, have you been recommended, or have you recommended anybody, for special recognition?

## IV Principle #4: Performance and Accountability (cont)

### 4.2 Performance Standards (cont)

**C. Questions for Department Employees:**

- 1) Repeat Question 4.2B.1.
- 2) Are you aware of a program for recognizing employees for exceptional performance relating to environmental issues? If yes, have you either been recommended for, or received, such recognition?

**V Principle #5: Measurement and Improvement**

**The agency develops and implements a program to assess progress toward meeting its environmental goals and uses the results to improve environmental performance.**

**Documentation****EMM Section:****EMS Procedures:****5.1 Evaluate Performance**

	<b>Y</b>	<b>N</b>
Has the agency developed a program to assess environmental performance and analyze information resulting from those evaluations to identify areas in which performance is or is likely to become substandard?		

**A. Questions for Top / Upper Level Management personnel:**

- 1) Have you developed a program to assess environmental performance? If yes, what does the program consist of?
- 2) Have any results from these assessments indicated areas in which performance is, or is likely to become, substandard? If yes, what actions were taken?
- 3) Have you evaluated information to determine the effectiveness of the EMS? If yes, what were the results?

**5.1.1 Gather and Analyze Data**

	<b>Y</b>	<b>N</b>
Has the agency instituted a systematic program to periodically obtain information on environmental operations and evaluate environmental performance against legal requirements and stated objectives, and developed procedures to process the resulting information?		

**A. Questions for Top / Upper Level Management personnel:**

- 1) Refer to Questions 5.1A

**B. Questions for Mid-Level Managers and Supervisors:**

- 1) Do you perform any monitoring of environmental operations? If yes, what do you monitor and how do you perform the monitoring (i.e., how often, methods, etc.)?
- 2) Do you evaluate environmental performance against legal requirements and/or stated objectives? If yes, what do you do with the information?

5.1.2 Institute Benchmarking

	Y	N
Has the agency instituted a formal program to compare its environmental operations with other organizations and management standards, where appropriate?		

A. Questions for Top / Upper Level Management personnel:

- 1) Have you assessed DOC operations to determine whether benchmarking would be beneficial with regard to environmental issues? If yes, have you contacted other governmental agencies that have implemented an EMS and compared your program with theirs? If yes, who?
- 2) Have you adopted any procedures practiced by another organization that has a functional EMS? If yes, how have you ensured that those practices are compatible with DOC's operations?

**V Principle #5: Measurement and Improvement (cont)**5.1.2 Institute Benchmarking (cont)B. Questions for Mid-Level Managers and Supervisors:

- 1) Have you worked with another organization that has already implemented an EMS? If yes, have you identified any environmentally-related programs conducted by that organization that would be beneficial to DOC?
- 2) Have you compared operations within DOC's EMS with other agencies? If yes, what did you determine and what did you do with that information?

5.2 Continuous Improvement

	Y	N
Has the agency implemented an approach toward continuous environmental improvement that includes preventive and corrective actions, as well as searching out new opportunities for programmatic improvements?		

A. Questions for Top / Upper Level Management personnel:

- 1) How have you implemented an approach to continuous environmental improvement?
- 2) Does your continuous improvement procedure include preventive and corrective actions, as well as seeking out opportunities for improvements in the EMS?
- 3) Is there a procedure by which you review the EMS at periodic intervals to evaluate its effectiveness and whether it needs to be changed to meet evolving goals and needs?

B. Questions for Mid-Level Managers and Supervisors:

- 1) Have you been assigned to investigate the cause of any deficiencies in the EMS? If yes,

what is the process?

- 2) Have you implemented corrective actions for any nonconformances identified with the EMS? If yes, have records been maintained and are they available for review?
- 3) Is there a program for lessons learned? If yes, of what does it consist?
- 4) How do you encourage suggestions for improvement from all employees?
- 5) Do you monitor the EMS to identify opportunities for improvement? If yes, what information have you collected and how has it been used?

C. Questions for Department Employees

- 1) Are you encouraged to be pro-active and to identify any opportunities for improving the EMS? For any DOC programs? If yes, how?
- 2) Have you identified any opportunities for improving the EMS? for improving DOC programs? If yes, what happened?